



Order Filed on March 3, 2021  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with  
D.N.J.LBR 9004-1**

**STEWART LEGAL GROUP, P.L.**  
*Formed in the State of Florida*  
Gavin N. Stewart, Esq.  
*Of Counsel to Bonial & Associates, P.C.*  
401 East Jackson Street, Suite 2340  
Tampa, FL 33602  
Tel: 813-371-1231/Fax: 813-371-1232  
E-mail: gavin@stewartlegalgroup.com  
*Attorney for Secured Creditor*

In re:

Irene Hempel

Debtor.

Chapter 13

Case No. 16-32399-CMG

Judge Christine M. Gravelle

**CONSENT ORDER RESOLVING CERTIFICATION OF DEFAULT**

The relief set forth on the following pages is hereby **ORDERED**.

**DATED: March 3, 2021**

A handwritten signature in black ink, reading "Christine M. Gravelle".

Honorable Christine M. Gravelle  
United States Bankruptcy Judge

Debtor: Irene Hempel  
Case No.: 16-32399-CMG  
Caption of Order: **CONSENT ORDER RESOLVING CERTIFICATION OF  
DEFAULT**

THIS MATTER having been opened to the Court upon the Certification of Default (“COD”) filed by Specialized Loan Servicing LLC as servicing agent for Deutsche Bank National Trust Company, as Trustee for Morgan Stanley Capital I Inc. Trust 2006-NC2, Mortgage Pass-Through Certificates, Series 2006-NC2 (“Creditor”), and whereas the Debtor and Creditor seek to resolve the Motion, it is hereby **ORDERED**:

1. The automatic stay provided under 11 U.S.C. §362(a) shall remain in effect as to Movant’s interest in the following property: **1321 Radio Road, Little Egg Harbor, New Jersey 08087** (“Property”) provided that the Debtor complies with the following:


- a. The Debtor shall list and actively market the Property for sale at a price to satisfy all liens on the Property and for a period not to exceed 120 days from the date of this Order with no extensions permitted; and
  - b. During the 120-day period, the Debtor shall pay Creditor monthly adequate protection payments in the amount of \$1,600.90 each, with the first payment due on or before March 15, 2021 and thereafter on the first day of each subsequent month until the expiration of the 120-day period.
2. Notwithstanding the above, the automatic stay provided under section 362(a) and the co-debtor stay provided under section 1301 of the Bankruptcy Code shall be terminated without further Order of the Court after the expiration of the 120-day period stated in Paragraph 1 above.
3. All payments due hereunder shall be sent directly to Creditor at the following address: **Specialized Loan Servicing LLC, 6200 S. Quebec Street, Greenwood Village, CO 80111.**

4. The Debtor will be in default under the Consent Order in the event that the Debtor fails to comply with the payment terms and conditions set forth in above paragraphs and/or if the Debtor fails to make any payment due to Creditor under the Chapter 13 Plan.

5. Unless the automatic stay and co-debtor stay are already terminated under the terms of this Order, should the Debtor fail to cure the default within thirty (30) days from the date of default, Creditor may submit a Certificate of Default to the Court on fourteen (14) days' notice to counsel for Debtor and the Chapter 13 Trustee for an order lifting the automatic stay imposed under 11 U.S.C. § 362(a) and permitting Creditor to exercise any rights under the loan documents with respect to the Property.

6. Creditor is awarded reimbursement of attorney fees in the amount of \$250.00 to be paid through the Chapter 13 Plan.

**STIPULATED AND AGREED:**

  
Joseph Casello, Esq.  
Collins, Vella & Casello  
2317 Route 34 South, Suite 1A  
Manasquan, NJ 08736  
*Counsel for Debtor*

/s/Gavin N. Stewart  
Gavin N. Stewart, Esq.  
Stewart Legal Group, P.L.  
401 East Jackson Street, Suite 2340  
Tampa, FL 33602  
*Counsel for Creditor*